

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

**DEFENDANT BIJAN RAFIEKIAN’S CONSENT MOTION FOR LEAVE
TO AMEND DEFENSE’S WITNESS LIST**

Defendant Bijan Rafiekian, through counsel, respectfully moves to amend his witness list previously submitted to this Court on July 14, 2019. [Dkt. No. 316]. One of the character witnesses on the Defendant’s list, Christine MacNulty, is no longer available to testify on Monday due to a family medical issue. As a result, the defense has arranged for a different character witness named Mark Mykleby to appear and provide character evidence on behalf of Mr. Rafiekian pursuant to Fed. R. Evid. 608. Mr. Mykleby’s name did not appear on the Defendant’s original witness list. Counsel for the government has consented to this motion.

CONCLUSION

For the foregoing reasons, Mr. Rafiekian respectfully requests that the Court grant Mr. Rafiekian’s motion to amend defense’s witness list.

Dated: July 21, 2019

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that, on the 21st day of July 2019, true and genuine copies of Defendant Bijan Rafiekian's Motion for Leave to Amend Defense's Witness List was sent via electronic mail by the Court's CM/ECF system to the following:

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